



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5

EPA Region 5 Records Ctr.



313481

FEB 19 2009

MEMORANDUM

SUBJECT: ACTION MEMORANDUM - Request for a Time-Critical Removal Action at the Rose Exterminator Site, Norwood, Hamilton County, Ohio (Site ID #B5QY)

FROM: Steve Renninger, On-Scene Coordinator
Emergency Response Branch 1/Response Section 1

TO: Richard C. Karl, Director
Superfund Division

THRU: Jason H. El-Zein, Chief 
Emergency Response Branch 1

I. PURPOSE

The purpose of this memorandum is to request and document your approval to expend up to \$318,870 to conduct a time-critical removal action at the Rose Exterminator Site (the Site), in Norwood, Ohio. The response actions proposed herein are necessary in order to mitigate threats to public health, welfare, and the environment posed by the presence of uncontrolled hazardous substances at the Site, a former pesticide manufacturing facility. The presence of hazardous substances existing at the Site has been documented, including uncontrolled, elevated concentrations of arsenic and lead. The Site includes a structurally impaired building adjacent to residential areas.

The time-critical removal action proposed herein will mitigate the threats by properly removing and disposing off-site the abandoned hazardous substances, pollutants and contaminants. Additional Site activities will include Site security; perimeter air monitoring; and removal of the contaminated building and surrounding contaminated soil to complete the removal action. This response action will be conducted in accordance with Section 104(a)(1) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 USC §9604(a)(1) to abate or eliminate the immediate threat posed to public health and/or the environment by the presence of the hazardous substances. The uncontrolled conditions of the hazardous substances present at the Site require that this action be classified as a time-critical removal action. The project will require approximately 15 working days to complete.

There are no nationally significant or precedent setting issues associated with the Site. The Site is not on the National Priorities List (NPL).

II. SITE CONDITIONS AND BACKGROUND

The CERCLIS ID # for this Site is: OHN 000 510 327

A. Physical Location and Description

The Site is located at 5421 Carthage Avenue, Norwood, Hamilton County, Ohio, 45207 (see Figure A-1). The Site includes a 0.055-acre parcel located in a primarily mixed land use area that includes commercial and residential properties. The Site is bounded by a former automobile repair garage and restaurant to the north; Carthage Avenue to the east; a residence to the south; and residences to the west. One vacant, cinder-block building exists on the property and is located approximately 100 feet off of Carthage Avenue. The structurally impaired building has a footprint approximately 33' x 20' in size, with 9' high cinder-block walls and no roof (see Figure A-2). Debris including concrete blocks, wood beams, toys, vegetation, and trash is scattered inside the building with evidence of trespassing. White staining (arsenic contamination) remains visible on the inside walls of the Site building. The geographical coordinates for the Site are Latitude 39.17393° North and Longitude 84.45535° West.

According to the Region V Superfund Environmental Justice Analysis, in Ohio the low income percentage is 30% or greater and the minority percentage is 16% or greater. To meet the Environmental Justice (EJ) criteria, the area within one mile of the Site must have a population that's twice the state low income percentage and/or twice the state minority percentage. At the Site, the low income percentage is 46% and the minority percentage is 48%, see Attachment III. Therefore, this Site does meet the Region's EJ criteria based on demographics as identified in Region V's "Interim Guidelines for Identifying and Addressing a Potential EJ Case," (June 1998).

B. Site Background – Rose Exterminator Company

The Site is currently vacant and owned by the estate of John Rogers. According to the City of Norwood, approximately 65 years ago the founder of the Rose Exterminator Company (a local exterminating company) used the building in a small-scale production of a rodenticide containing arsenic. According to Site records, it has been since the 1940s since the product was mixed and packaged in the building. The company ceased operations in 1974 and the building has since remained unoccupied.

C. Site Background – Norwood Health Department

The Norwood Health Department (NHD) initiated an investigation of the Site on April 29, 1974, with assistance from NIOSH. Based on documentation, samples were collected and only analyzed for arsenic. NIOSH personnel sampled the building rafter wood, and conducted wipe grab samples on the floor, walls, and other surfaces within the Site building. Sample results indicated that elevated levels of arsenic contamination were present and prompted the submittal of a 1974 letter to the current owner (Rose Exterminator Company) requesting the proper cleanup and decontamination of the

building. NHD continued to conduct inspections at the Site in 1977, 1978, and 1980 with no apparent response from the Rose Exterminator Company.

A new owner (Mr. John Rogers, Jr.) acquired the property in 1981 and expressed interest in demolishing the Site building. NHD contacted the new owner regarding past contamination and recommended decontamination before demolishing the building. A Health Hazard Evaluation Report completed by NIOSH in 1981 was initiated in response to a request by the NHD to determine the extent of arsenic contamination within the building. A total of 14 dust samples were collected from various surfaces from within the building. NIOSH found arsenic content as high as 41% and laboratory values ranging from 1.4 micrograms per square inch to 2,100 micrograms per square inch. NIOSH recommended the decontamination and demolition of the Site building. Following the 1981 NIOSH report, a permit was issued in September 1982 to the property owner for the decontamination and demolition of the Site building. After this, no further correspondence exists until September 2004, when a NHD Nuisance Investigation Report was initiated.

On September 14, 2004, NHD conducted an inspection of the Site. NHD observations included an old oil tank at the rear of the property, as well as a large area of dumping containing dirt, concrete, and asphalt.

D. Site Background – Ohio Environmental Protection Agency

In a report dated June 25, 2008, Tetra-Tech EM, Inc. (Tetra Tech) completed a Phase 1 Environmental Site Assessment (PESA) at the Rose Exterminator Site. Tetra Tech was tasked by the Ohio Environmental Protection Agency (Ohio EPA) Division of Emergency and Remedial Response to perform the Phase 1 PESA of the vacant Rose Exterminator Company Warehouse.

In a letter dated January 29, 2009, the Ohio EPA requested assistance from U.S. EPA Region V Superfund Division in conducting a potential time-critical removal action involving uncontrolled arsenic at the Site.

E. Site Background – U.S. Environmental Protection Agency

On December 30, 2008, U.S. EPA mobilized its Superfund Technical Assessment and Response Team (START) contractor to the Site. U.S. EPA tasked START to perform a Site Investigation including soil sample collection. Activities performed during the Site Investigation included:

- Documentation of current Site conditions;
- Analyzing surface soil and wall dust samples for total metals utilizing an INNOV-X model Alpha 4000 portable handheld X-ray Fluorescence (XRF) analyzer;
- Collecting 3 soil samples (sample numbers S-1 through S-3) within the building and one soil sample (sample number S-4) from outside of the building for total Resource Conservation and Recovery Act (RCRA) metals and Toxicity Characteristic Leachate Procedure (TCLP) RCRA metals analysis; and

- Determining the extent of arsenic contamination

During the U.S. EPA Site Investigation, the OSC and START contractor noted a structurally impaired Site building. The structurally impaired building is approximately 33' x 20' in size, with 9' high cinder-block walls and no roof. Debris including concrete blocks, wood beams, toys, vegetation, and trash was scattered inside the building with evidence of trespassing. White staining (arsenic contamination) remained visible on the inside walls of the Site building.

The START contractor determined the following XRF readings (see Figure A-3):

- the building walls ranged from 763 parts per million (ppm) to 2,529 ppm total arsenic;
- the ground surface within the vacant building ranged from 346 ppm to 73,101 ppm total arsenic and 40 ppm to 1,795 ppm total lead; and
- the ground surface outside of the vacant building ranged from non-detect to 2,720 ppm total arsenic and non-detect to 1,637 ppm total lead.

Laboratory sample results from one soil sample collected from inside the building documented a TCLP arsenic level of 7.44 milligrams per liter (mg/L), which exceeds the TCLP arsenic regulatory level of 5 mg/L, and defines the waste as characteristic hazardous waste for toxicity (D004). U.S. EPA Site Investigation sampling results are found in Tables 1 and 2.

TABLE 1
U.S. EPA LABORATORY SAMPLING RESULTS – TOTAL RCRA METALS
ROSE EXTERMINATOR SITE
NORWOOD, HAMILTON COUNTY, OHIO

Total RCRA Metals	Sample Identification Number			
	S-1	S-2	S-3	S-4
Arsenic	68,800	45,300	17,800	2,980
Barium	95	105	102	1,420
Cadmium	ND	ND	153	9.45
Chromium	ND	ND	ND	12.7
Lead	ND	ND	170	1,560
Mercury	11	9.63	5.24	1.5
Selenium	ND	ND	ND	ND
Silver	ND	ND	ND	ND

Notes:

All results reported in parts per million.

ND = Not detected at method detection limits

TABLE 2
U.S. EPA LABORATORY SAMPLING RESULTS – TCLP RCRA METALS
ROSE EXTERMINATOR SITE
NORWOOD, HAMILTON COUNTY, OHIO

TCLP RCRA Metals	Regulatory Level	Sample Identification Number			
		S-1	S-2	S-3	S-4
Arsenic	5.0	7.44	2.2	2.58	0.557
Barium	100.0	0.225	0.186	0.205	0.545
Cadmium	1.0	ND	ND	0.398	ND
Chromium	5.0	ND	ND	ND	ND
Lead	5.0	ND	ND	ND	ND
Mercury	0.2	ND	ND	ND	ND
Selenium	1.0	ND	ND	ND	ND
Silver	5.0	ND	ND	ND	ND

Notes:

All results reported in milligrams per liter.

ND = Not detected at method detection limits

TCLP = Toxicity Characteristic Leaching Procedure

III. THREATS TO PUBLIC HEALTH, WELFARE, OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

The conditions present at the Rose Exterminator Site present an imminent and substantial threat to the public health, or welfare, and the environment based upon the factors set forth in Section 300.415(b)(2) of the National Oil and Hazardous Substances Pollution Contingency Plan (NCP), as amended, 40 CFR Part 300. These factors include, but are not limited to, the following:

1) Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants;

During the December 30, 2008, U.S. EPA Site Investigation, the OSC noted a structurally impaired Site building. The structurally impaired building is approximately 33' x 20' in size, with 9' high cinder-block walls and no roof. Debris including concrete blocks, wood beams, toys, vegetation, and trash is scattered inside the building with evidence of trespassing. White staining (arsenic contamination) remains visible on the inside walls of the Site building.

The U.S. EPA START contractor conducted total metals analysis using an INNOV-X handheld XRF instrument from inside and outside of the building. The START contractor documented the following XRF readings:

- the walls ranged from 763 ppm to 2,529 ppm total arsenic;
- the ground surface within the vacant building ranged from 346 ppm to 73,101 ppm total arsenic and 40 ppm to 1,795 ppm total lead; and

- the ground surface outside of the vacant building ranged from non-detect to 2,720 ppm total arsenic and non-detect to 1,637 ppm total lead.

Laboratory sample results documented a TCLP arsenic level of 7.44 mg/L, which exceeds the TCLP arsenic regulatory level of 5 mg/L, and defines the waste as characteristic hazardous waste for toxicity (D004).

Exposure to arsenic can be through ingestion, inhalation or through skin absorption. Once absorbed, arsenic is widely distributed throughout the body tissues including the liver, abdominal viscera, bone and skin. Acute arsenic poisoning in humans is usually by accidental or intentional ingestion. Although rare, acute poisoning may be followed by difficulty in swallowing, irritation of the mouth, vomiting and diarrhea, coma and death.

Long-term arsenic exposure is linked to liver, lung, prostate, bladder, kidney, and non-melanoma skin cancers. Arsenic does not appear to be linked to Non-Hodgkin's lymphoma or other leukemias. Lead is a well-documented poison that causes a variety of health effects, including developmental delays and lowered IQ in children. Other health effects linked to long term lead exposure include brain and kidney damage. Children and fetuses are particularly vulnerable to lead.

Residential areas are located within 50 feet of the Site. Even with the restricted access onto the Site, trespassing has occurred and an accidental or intentional release of hazardous material, contact with hazardous materials is possible. The close proximity of residences immediately adjacent to the Site greatly increases the likelihood of human health and environmental impacts, should such an occurrence take place. The OSC noted that rainwater enters the building (that has no roof) and that arsenic and lead contamination was determined to be migrating into the environment. Potential exposure could occur through each of these migration pathways and cause imminent endangerment to human health and the environment.

The Site is temporarily secure (door nailed closed), but because residential properties are located within 50 feet, trespassers could still enter the facility with little effort. Exposure pathways include direct contact and inhalation associated with uncontrolled arsenic contamination in and around the Site building.

2) Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released;

Southwestern Ohio receives a substantial amount of precipitation during spring, and winter temperatures are normally below freezing with regular snowfall. Weather conditions will continue to contribute to the deterioration of the building, and precipitation will continue to cause arsenic contamination to spread from the Site building.

3) The availability of other appropriate Federal or State response mechanisms to respond to the release;

In a letter dated January 29, 2009, the Ohio EPA requested assistance from U.S. EPA in conducting a potential time-critical removal action involving uncontrolled arsenic contamination at the Site.

IV. ENDANGERMENT DETERMINATION

Given the Site conditions, the nature of the known and suspected hazardous substances on site, and the potential exposure pathways described in Sections II and III, actual or threatened releases of hazardous substances from this Site, if not addressed by implementing the response actions selected in this Action Memorandum, may present an imminent and substantial endangerment to public health, or welfare, or the environment.

V. PROPOSED ACTIONS AND ESTIMATED COSTS

The OSC proposes to undertake the following response actions to mitigate threats posed by the presence of hazardous substances at the Site:

1. Develop and implement a Site-specific Health and Safety Plan, including an Air Monitoring Plan, and a Site Emergency Contingency Plan;
2. Develop and implement a Site Security Plan;
3. Consolidate all hazardous substances, pollutants and contaminants for transportation and off-site disposal including contaminated soil, building structure, and debris;
4. Transport and dispose of all identified hazardous substances, pollutants, wastes, or contaminants to a RCRA/CERCLA-approved disposal facility in accordance with U.S. EPA's Off-Site Rule (40 CFR § 300.440).
5. Conduct post removal Site sampling to confirm cleanup;
6. Grade and seed site to prevent soil erosion;
7. Take any other response actions to address any release or threatened release of a hazardous substance, pollutant or contaminant that the EPA OSC determines may pose an imminent and substantial endangerment to the public health or the environment.

The removal action will be conducted in a manner not inconsistent with the NCP. The OSC has initiated planning for provision of post-removal Site control consistent with the provisions of Section 300.415(I) of the NCP.

The threats posed by uncontrolled substances considered hazardous meet the criteria listed in Section 300.415(b)(2) of the NCP and the response actions proposed herein are consistent with any long-term remedial actions which may be required. Elimination of hazardous substances, pollutants and contaminants that pose a substantial threat of release is expected to minimize substantial requirements for post-removal Site controls.

The estimated costs to complete the above activities are summarized below. These activities will require an estimated 15 on-site working days to complete.

Detailed cleanup contractor costs are presented in Attachment 1.

REMOVAL PROJECT CEILING ESTIMATE

EXTRAMURAL COSTS:

<u>Regional Removal Allowance Costs:</u>	\$232,725
Total Cleanup Contractor Costs (Includes a 15% contingency).	

Other Extramural Costs Not Funded from the Regional Allowance:

Total START, including multiplier costs	<u>+\$ 33,000</u>
Subtotal, Extramural Costs	\$265,725
Extramural Costs Contingency (20% of Subtotal, Extramural Costs)	<u>+\$ 53,145</u>

TOTAL, REMOVAL ACTION PROJECT CEILING	\$318,870
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The response actions described in this memorandum directly address the actual or threatened release of hazardous substances, pollutants, or contaminants at the Site which may pose an imminent and substantial endangerment to public health or welfare or to the environment. These response actions do not impose a burden on affected property disproportionate to the extent to which that property contributes to the conditions being addressed.

Applicable or Relevant and Appropriate Requirements

All applicable and relevant and appropriate requirements (ARARs) of Federal and State law will be complied with to the extent practicable. The OSC sent a letter dated January 29, 2009, requesting ARARs to Kelly Kaletsky, Ohio EPA Southwest District Office, for any applicable State ARARs. Any State ARARs identified in a timely manner will be complied with to the extent practicable.

All hazardous substances, pollutants or contaminants removed off-site pursuant to this removal action for treatment, storage and disposal shall be treated, stored, or disposed

at a facility in compliance, as determined by U.S. EPA, with the U.S. EPA Off-Site Rule, 40 CFR § 300.440.

VI. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

Delayed or no action will result in increased potential of the toxic and hazardous substances to release, thereby threatening the environment and the health and welfare of nearby residents and other persons who are in proximity to the Site.

VII. OUTSTANDING POLICY ISSUES

None

VIII. ENFORCEMENT

For administrative purposes, information concerning the enforcement strategy for this Site is contained in the Enforcement Confidential Addendum.

The total EPA costs for this removal action based on full-cost accounting practices that will be eligible for cost recovery are estimated to be \$600,926¹

$$(\$318,870 + 50,000) + (62.91\% \times 318,870) = \$600,926$$

IX. RECOMMENDATION

This decision document represents the selected removal action for the Rose Exterminator Site located in Norwood, Hamilton County, Ohio. This document has been developed in accordance with CERCLA as amended, and is not inconsistent with the NCP. This decision is based on the Administrative Record for the Site, see Attachment II. Conditions at the Site meet the NCP §300.415(b)(2) criteria for a time-critical removal action and I recommend your approval of the proposed removal action.

¹ Direct Costs include direct extramural costs and direct intramural costs. Indirect costs are calculated based on an estimated indirect cost rate expressed as a percentage of site specific direct costs, consistent with the full cost accounting methodology effective October 2, 2000. These estimates do not include pre-judgement interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States right to cost recovery.

The total removal project ceiling, if approved, will be \$318,870. Of this, an estimated \$285,870 may be used for the cleanup contractor costs. You may indicate your decision by signing below.

APPROVE: Richard C Kal DATE: 2-19-09
Director, Superfund Division

DISAPPROVE: _____ DATE: _____
Director, Superfund Division

Enforcement Addendum

Figures:

- A-1 Site Location Map
- A-2 Site Layout Map
- A-3 Sample Summary Map
- A-4 Photo Log

Attachments:

- I. Detailed Cleanup Contractor Cost Estimate
- II. Administrative Record Index
- III. Region V EJ Analysis
- IV. Independent Government Cost Estimate

cc: David Chung, U.S. EPA, 5203-G
Michael Chezick, U.S. DOI, **w/o Enf. Addendum**
Kevin Clouse, OEPA, **w/o Enf. Addendum**
Richard Cordray, Ohio Department of Attorney General, **w/o Enf. Addendum**
Chris Korleski, Director, Ohio EPA, **w/o Enf. Addendum**

ENFORCEMENT ADDENDUM

**ROSE EXTERMINATOR SITE
5421 CARTHAGE AVENUE, HAMILTON COUNTY, NORWOOD, OHIO**

FEBRUARY 2009

(REDACTED 2 PAGES)

**ENFORCEMENT CONFIDENTIAL
NOT SUBJECT TO DISCOVERY**

FIGURE A-1
SITE LOCATION MAP



File: C:\START Project Files\Rose Exterminator\GIS Files\mxd\Figure A-1 Site Location Map.mxd

Image Source:
National Geographic Society

0 0.5 1
Miles



Prepared for:
U.S. EPA Region 5
Contract No: EP-S5-06-04



Prepared by:
Weston Solutions, Inc.

Figure A-1

Site Location Map
Rose Exterminator Site
Norwood, Hamilton County, Ohio
January 29, 2009

FIGURE A-2
SITE LAYOUT MAP

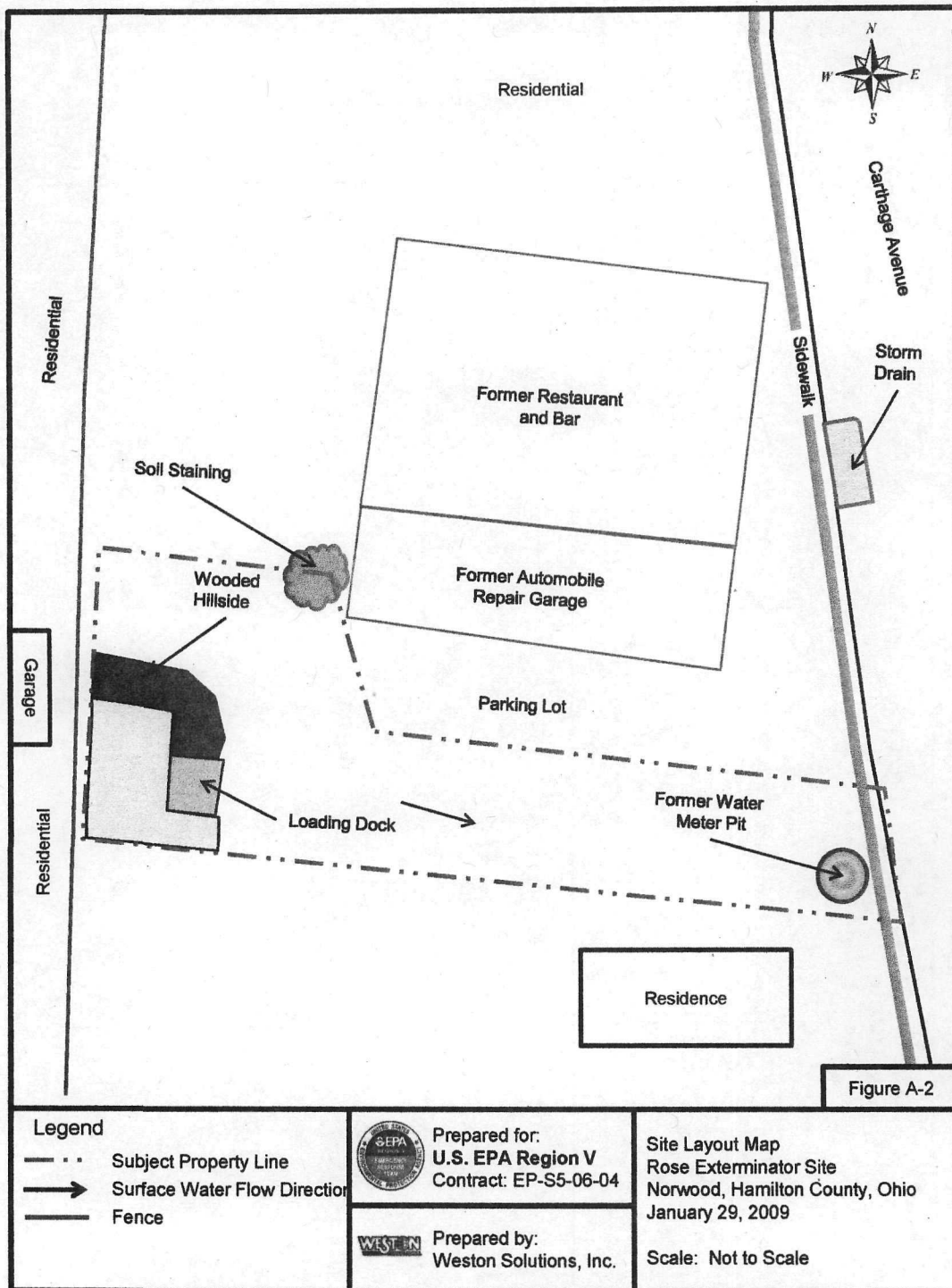


FIGURE A-3

SAMPLE SUMMARY MAP

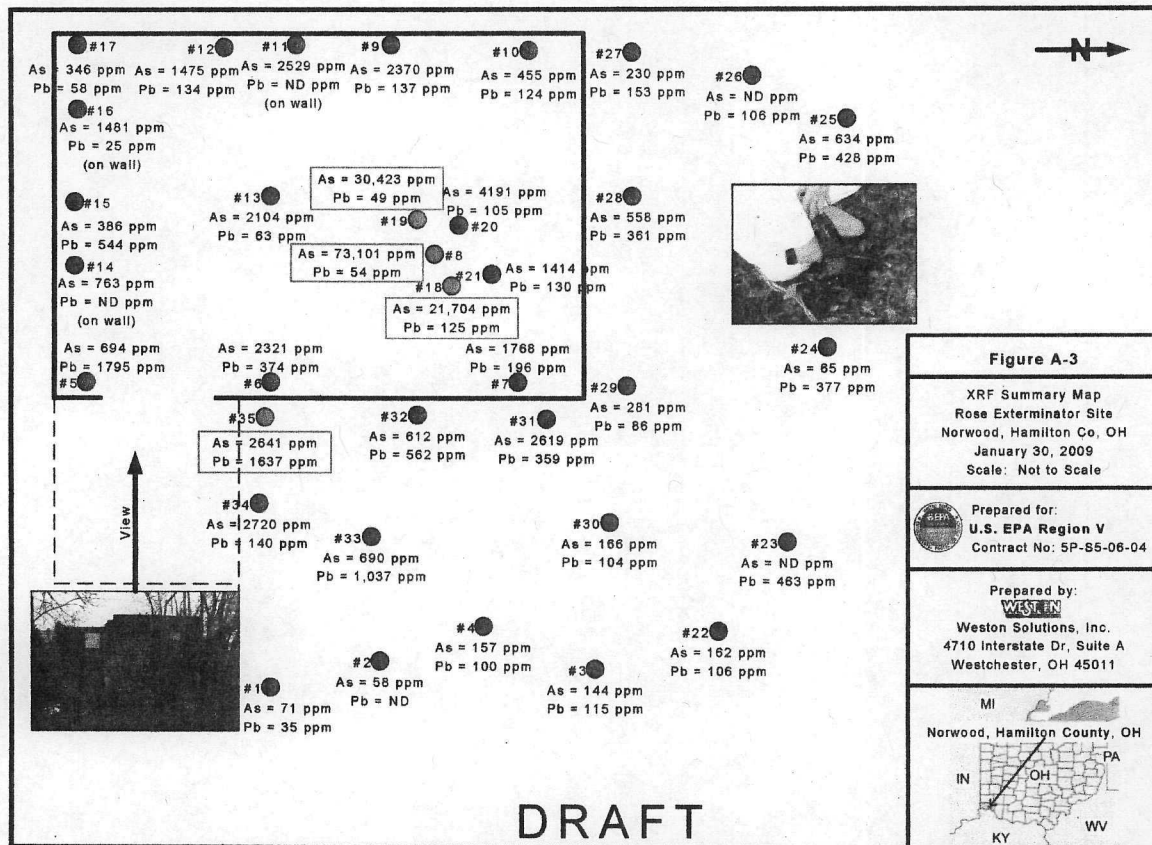
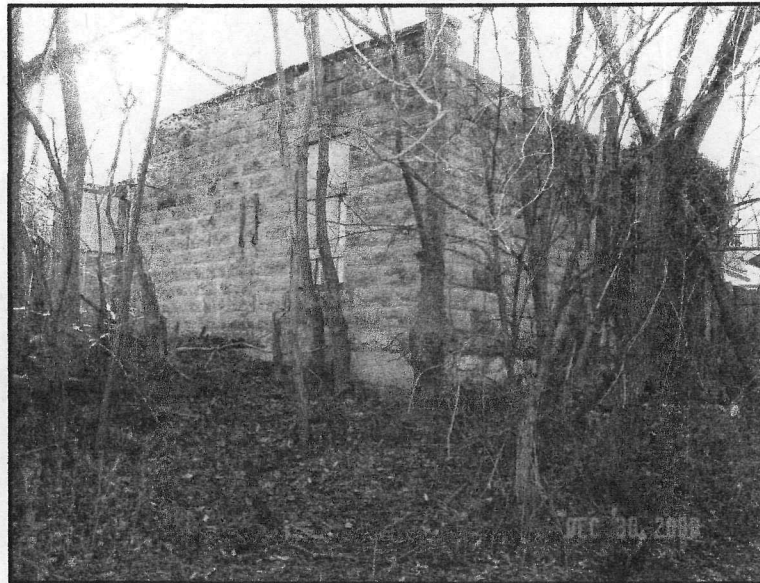
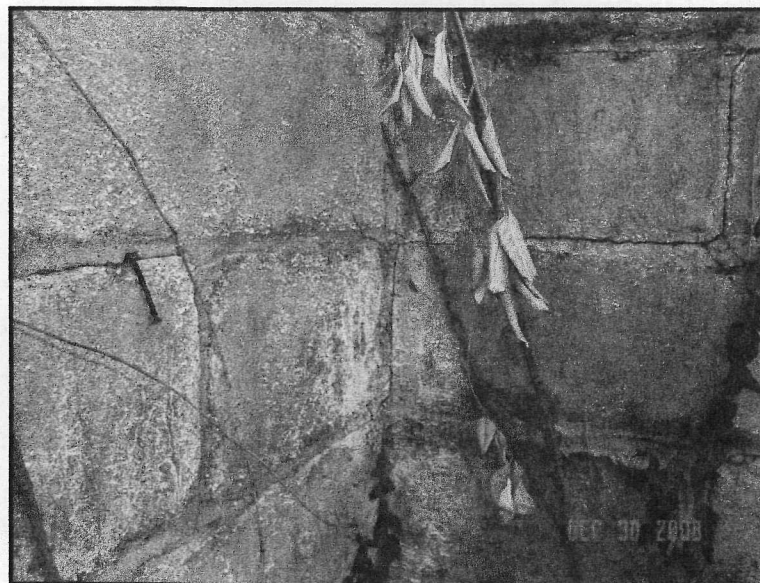


FIGURE A-4

PHOTO LOG



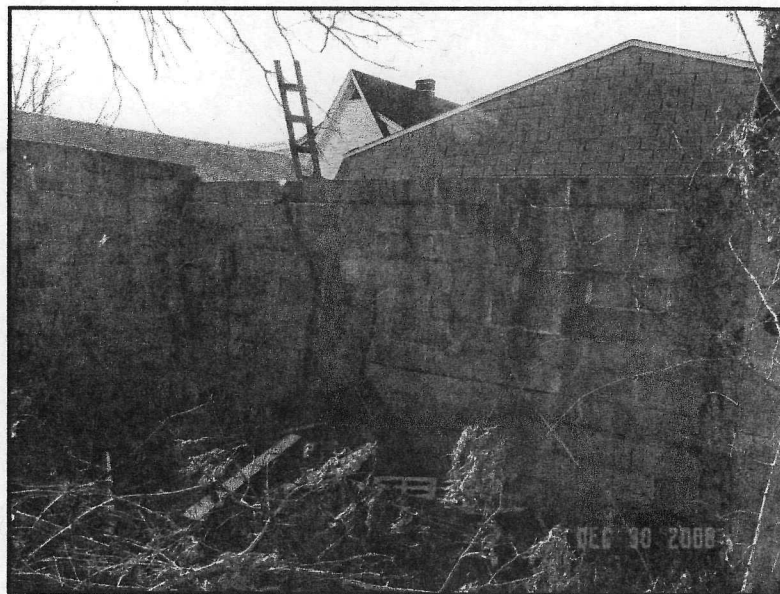
Above: View of front of Rose Exterminator Site building. Structurally impaired building with no roof.



Above: View of interior, arsenic contaminated walls (white staining).



Above: View from interior of Site building. Note close proximity of residence in the background.



Above: View of interior of Site building. Arsenic contamination as high as 73,101 ppm on floor. Note ladder and close proximity of residence in background.

ATTACHMENT I

DETAILED CLEANUP CONTRACTOR COST ESTIMATE

ROSE EXTERMINATOR SITE NORWOOD, HAMILTON COUNTY, OHIO FEBRUARY 2009

The estimated cleanup contractor (ERRS) costs necessary to complete the removal action at the Rose Exterminator Site are as follows:

Personnel & Equipment	\$ 81,370
Materials/Misc	\$ 22,000
Transportation and Disposal	+ <u>\$ 99,000</u>
Total	\$202,370
Plus 15% Contingency	+ <u>\$ 30,355</u>
Total ERRS Contractor Costs	\$232,725

ATTACHMENT II

U.S. ENVIRONMENTAL PROTECTION AGENCY REMOVAL ACTION

ADMINISTRATIVE RECORD FOR ROSE EXTERMINATOR SITE NORWOOD, HAMILTON COUNTY, OHIO

ORIGINAL
FEBRUARY 2009

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
1	05/16/74	Kronoveter, K., National Institute for Occupational Safety and Health	Harmon, C., City of Norwood Health Department	Letter re: Decontamination of the Rose Exterminator Company Facility w/Attached Data Sampling	3
2	05/24/74	Quade, R., City of Norwood Health Department	Dold, R., Rose Exterminating Company	Letter re: Sampling for Arsenic at the Rose Ex- terminator Company Facility	1
3	07/20/74	Dold, R., Rose Exterminator Company	Harmon, C., City of Norwood Health Department	Letter re: Request for De- contamination Criteria for the Rose Exterminator Company Facility	1
4	07/25/74	Harmon, C., City of Norwood Health Department	Dold, R., Rose Exterminator Company	Letter re: Identification of Decontamination Cri- teria for the Rose Ex- terminator Company Facility	1
5	11/03/78	Harmon, C., City of Norwood Health Department	Dold, R., Rose Exterminator Company	Letter re: Health Depart- ment Violations at the Rose Exterminator Company Facility	1
6	03/03/80	Harmon, C., City of Norwood Health Department	Dold, R., Rose Exterminator Company	Letter re: February 27,, 1980 Inspection of the Rose Exterminator Company Facility	1
7	07/16/81	Winfough, D., City of Norwood Health Department	Rogers, J., Brother's Café	Letter re: Identification of Decontamination Cri- teria for the Rose Ex- terminator Company Facility	2

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
8	02/02/82	Boiano, J., National Institute for Occupational Safety and Health	Harmon, C., City of Norwood Health Department	Letter re: November 5, 1981 Sample Investigation at the Rose Exterminator Company Facility w/At- tached Sampling Data	6
9	03/00/82	National Institute for Occupational Safety and Health	File	NIOSH Health Hazard Evaluation Report 82-017	9
10	03/10/82	Ontko, T., Ohio EPA	Harmon, C., City of Norwood Health Department	Letter re: Identification of Decontamination Cri- teria for the Rose Ex- terminator Company Facility	1
11	09/22/82	Winfrough, D., City of Norwood Health Department	Frazier, D., City of Norwood Building Department	Letter re: Approval of Permit for Demolition of the Rose Exterminator Company Facility	2
12	11/15/04	Laake, D., City of Norwood Health Department	Rogers, J., Owner	Letter re: Documentation of Arsenic Decontamination at the Rose Exterminator Company Facility	2
13	08/20/07	Reeves, M., City of Norwood Building Department	Rogers, J., Owner	Letter re: Violation and Orders Issued Against the Rose Exterminator Company Facility (Final Notice)	1
14	06/25/08		U.S. EPA	Phase I Environmental Site Assessment for the Rose Exterminator Site	35
15	01/29/09	Clouse, K., Ohio EPA	Durno, M., U.S. EPA	Letter re: Ohio EPA's Re- quest for U.S. EPA Assis- tance at Rose Exterminator Site	1

<u>NO.</u>	<u>DATE</u>	<u>AUTHOR</u>	<u>RECIPIENT</u>	<u>TITLE/DESCRIPTION</u>	<u>PAGES</u>
16	00/00/00	Weston Solutions, Inc.	U.S. EPA	Site Assessment Report for the Rose Exterminator Site (PENDING)	
17	00/00/00	Renninger, S., U.S. EPA	El-Zein, J., U.S. EPA	Action Memorandum: Request for a Time-Critical Removal Action at the Rose Exterminator Site (PENDING)	

ATTACHMENT IV

**INDEPENDENT GOVERNMENT COST ESTIMATE
ROSE EXTERMINATOR SITE
NORWOOD, HAMILTON COUNTY, OHIO**

FEBRUARY 2009

(REDACTED 2 PAGES)

NOT RELEVANT TO THE SELECTION OF THE REMOVAL ACTION